LINCOLN SQUARE LEGAL SERVICES, INC.

Fordham University School of Law 150 West 62nd Street, Ninth Floor New York, NY 10023 Tel 212-636-6934 Fax 212-636-6923

August 25, 2023

VIA EMAIL AND ECF

The Honorable Katherine Polk Failla United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007



Re: <u>United States v. Esteban Cabrera Da Corte, et al.,</u> 22-CR-437 (KPF)

Your Honor:

We write on behalf of Mr. Asdrubal Ramirez Mesa to request a one-week adjournment of the submission date of our Reply to the Government's Opposition to the Defendant's Motion for Suppression and Severance. This is our first request to adjourn the submission date for the reply. The current submission date is August 31, 2023. If the Court grants this request, the reply would be due on September 7, 2023.

We make this request because several other matters on our docket have required unexpected work this week, and we are constrained to seek additional time to meet our responsibilities to Mr. Ramirez Mesa. There is a conference on this motion scheduled for October 11, 2023, and we seek no extension of that conference date. We have conferred with the government about this request, and they have no objection.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

Michael W. Martin, Esq. Lincoln Square Legal Services, Inc. Counsel for Asdrubal Ramirez Mesa cc: Emily Deininger

Timothy Josiah Pertz

Assistant United States Attorneys (S.D.N.Y.)

By Email and ECF

Bijan Parwaresch, Esq.

Counsel for Luis Hernandez Gonzalez

By Email and ECF

Application GRANTED. Defendant shall file a Reply to the Government's Opposition to the Defendant's Motion for Suppression and Severance on or before **September 7, 2023**.

The Clerk of Court is directed to terminate the motion at docket entry 83.

Dated: August 28, 2023

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

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